

August 6, 2018

Ms. Jennifer Jessup
Departmental Paperwork Clearance Officer
Department of Commerce
Room 6616
14th and Constitution Avenue, NW
Washington, DC 20230

RE: Comments on Proposed Information Collection on 2020 Census, Docket No. USBC-2018-0005

To Whom It May Concern:

The Center for Public Policy Priorities respectfully submits the following comments to the Department of Commerce in response to the proposed information collection on 2020 Census (Docket No. USBC-2018-0005). We urge the Department of Commerce to remove the citizenship question from the 2020 Census form, as it will jeopardize the accuracy of the census in all communities – an outcome that the nation will have to live with for the next 10 years.

At the Center for Public Policy Priorities (CPPP), we believe in a Texas that offers everyone the chance to compete and succeed in life. We envision a Texas where everyone is healthy, well-educated, and financially secure. We want the best Texas – a proud state that sets the bar nationally by expanding opportunity for all. CPPP is an independent public policy organization that uses data and analysis to advocate for solutions that enable Texans of all background to reach their full potential. As researchers, we rely on data from the Census Bureau for our work, and as experts on policy in Texas, we believe an inaccurate 2020 Census could have dire consequences for our state.

We believe a full, fair, and accurate census, and the collection of useful, objective data about our nation's people, housing, economy, and communities, is vitally important. Not only is a nationwide census required by the Constitution, it is integral to our democracy, ensuring that district lines and political power are fairly drawn and allocated. The federal government uses census-derived data to direct more than \$600 billion annually in federal assistance to states, localities, and families. The data also guide important community decisions affecting schools, housing, health care services, business investment, and much more.

Simply put, a fair and accurate census is essential for all basic functions of our society. ***That is why the 2020 Census should not include a question on citizenship that the weight of scientific evidence indicates will undermine a successful count of our nation's people.***

Texas is home to many families with mixed immigration statuses, and fears of, detention, deportation and separation from family members and loved ones might discourage even U.S. citizens in a mixed status household from responding to the Census. Even though information gathered in the Census cannot legally be shared with other government agencies, current anti-immigrant rhetoric and policies could lead more immigrants and their families not to participate in the Census.

The effects of the controversial citizenship question could be widespread and more detrimental in states with a large immigrant population such as Texas. Communities would be deprived of critical information and funding necessary to respond to the needs of our growing state. The state could lose out on representation in Washington and hundreds of million dollars per year in federal funding. If Texas residents are undercounted by even one percent, Texas could lose at least \$300 million a year. Reduced funding for critical programs could create additional barriers to opportunity for low-income Texans. A fair and accurate Census is critical nationwide, and the addition of the citizenship question could jeopardize that accuracy disproportionately in Texas.

Even before Secretary Ross' decision to place a citizenship question on the 2020 Census, state and local officials and community leaders were deeply concerned about the difficulty of achieving robust participation in many communities. In the current political environment, immigrants feel demonized, and their worst fears are realized when federal agents invade homes, schools, and places of worship and families are torn apart both at the U.S. border and in the heart of communities. Not surprisingly, the request has drawn intense opposition from a nonpartisan and ideologically broad group of business leaders, state and local officials, social scientists, and civil and human rights advocates who know how much is at stake with a fair and accurate census. This groundswell of opposition has included more than 160 Republican and Democratic mayors, six former directors of the Census Bureau and two former Commerce Secretaries from Republican and Democratic administrations, civil and human rights groups, more than 600 faith leaders, more than 120 members of the U.S. House of Representatives, and many others representing a diversity of political ideologies and communities. **All are united in their deep-seated concern that an untested citizenship question will compromise implementation of the 2020 Census and jeopardize the quality and accuracy of census data for all communities.**

The harm from this decision (if it is not reversed) would be universal, with communities that are already at greater risk of being undercounted – including people of color, young children, and low-income rural and urban residents – suffering the most. An untested citizenship question will drive up costs as the Census Bureau struggles to develop new communications and outreach strategies with little time remaining, plan for an expanded field operation, and track down the millions of households that will be more reluctant to participate because of this controversial question. In sum, asking about citizenship status in a climate of fear and mistrust can only heighten suspicions, depress response rates, cost additional taxpayer money, and thwart an accurate, inclusive 2020 enumeration.

A full, fair, and accurate census is absolutely critical for our community. For the reasons discussed above, we strongly oppose asking about citizenship status in the 2020 Census and urge the Department of Commerce to remove the proposed citizenship question from the data collection forms.

Thank you for the opportunity to comment on these important issues. If you have any questions or need further information, please contact Kristie Tingle, CPPP Research Analyst at 512-823-2871 or tingle@cphp.org.

Sincerely,

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